

dictionary corresponds to Watters's first business data system" and that the claimed "second dictionary corresponds to Watters's second business data system" (lines 3-7). Watters' first and second business data systems are not analogous to the claimed first and second dictionaries. Watters' first business data system (Fig. 1, element 12) is not a dictionary at all, but rather, an entire data system composed of data files (Fig. 1, element 16), a data storage device (Fig. 1, element 18), and a data composition system (Fig. 1, element 20) attached to a data transfer medium (Fig. 1, element 22). Watters second business data system (Fig. 1, element 14) is not a dictionary at all, but rather, an entire data system composed of data files (Fig. 1, element 24), a data storage device (Fig. 1, element 26), and a conversion system (Fig. 1, element 28) attached to a data transfer medium (Fig. 1, element 22).

To the contrary, in Applicant's claimed invention, the translation engine 205 uses the first dictionary 201 to normalize the input data 204 from the input format into the format of a core data structure 203 (p. 23, lines 1-3). The translation engine 205 subsequently uses the second dictionary to normalize into the desired output format the input data 204 which has been normalized into the format of the core data structure 203. Watters does not teach using two separate dictionaries to perform data normalization in two separate steps, but rather, Watters teaches using a single dictionary. As shown in block 78 of Watters' Figure 3, output records are generated in accordance with the format of the document map 56, which is a single document map that "contains a predetermined data format that will allow the data to be transferred between the first business entity and the second business entity" (col. 5, lines 40-43). This can also be seen in Watters' Figure 4, which is "a flow chart of an exemplary process 80 for transmission from a data processing system of a first business entity to a data processing system of a second

business entity in accordance with teachings of the present invention" (col. 7, lines 7-11). For example, Figure 4 shows block 94, wherein, for each record, "[c]ontrol records that cause data composition system to construct and output EDI document segments are processed" (col. 7, lines 48-50). This is only a single step, rather than the two steps of Applicant's claim 1. Also, at block 104, for each field of each record, "control records or control fields that cause predetermined EDI document segments to be constructed and output are processed" (col. 8, lines 8-11). Again, this is only a single step, rather than the two steps of Applicant's claim 1. There is no second normalization step using a second map or dictionary illustrated in Figures 3 or 4 or the corresponding description in the specification.

Since Watters does not employ two dictionaries, nor teach performing normalization in two steps, Watters cannot be said to anticipate claims 1 or 18, nor claims 2-7, 11, 17, 19-24 and 28, which depend either directly or indirectly therefrom and are patentable for the same reasons as stated above for claims 1 and 18, as well as for their own additional limitations.

With reference to the obviousness rejection of claims 8-10, 12-16, 25-27 and 29-33, these claims also depend either directly or indirectly from claims 1 or 18 and are patentable for the same reasons as stated above for claims 1 and 18, as well as for their own additional limitations.

For the foregoing reasons, Applicant respectfully requests that the pending rejections of claims 1-33 be withdrawn.

Having dealt with all the objections raised by the Examiner, it is respectfully submitted that the subject Application is in condition for allowance. Thus, allowance at an early date is earnestly solicited.

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

In the event the Examiner deems personal contact desirable in the disposition of this case, the Examiner is respectfully requested to call the undersigned attorney at (520) 882-7623.

In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account No. 08-1391.

Respectfully submitted,



Kevin M. Drucker
Attorney for Applicant
Reg. No. 47,537

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on August 6, 2003, at Tucson, Arizona.

By Najat M. Kalam

KMD:nm

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567